

EXHIBIT “B”

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

VÁSTAGO PRODUCCIONES, LLC

Plaintiff

v.

HEAVEN PUBLISHING LLC and
MICHAEL RODRIGUEZ*Defendant*

Civil Action No. 4:23-cv-01432

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Google LLC

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment "A".

Place: First Legal
1000 G Street, Suite 250
Sacramento, California 95814

Date and Time:
12/04/2023 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 11/09/2023

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
Plaintiff Vástago Producciones, LLC _____, who issues or requests this subpoena, are:
Michael Trauben, 400 S. Beverly Dr., Ste 240, Beverly Hills, CA 90212, 310.856.9705 | mtrauben@singhtraubenlaw.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 4:23-cv-01432

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*I received this subpoena for *(name of individual and title, if any)* Google LLCon *(date)* 11/09/2023 .☒ I served the subpoena by delivering a copy to the named person as follows: Jenn Bautista, Authorized

Agent for Registered Agent, Corporations Service Company; 2710 Gateway Oaks Drive, Ste 150 N

Sacramento, CA 95833 at 12:40 PM on *(date)* 11/13/2023 ; or☐ I returned the subpoena unexecuted because: _____Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____ .

My fees are \$ 50.00 for travel and \$ _____ for services, for a total of \$ 50.00 .

I declare under penalty of perjury that this information is true.

Date: 11/15/2023

*Server's signature*

Jenice Rossner, Process Server

*Printed name and title*3104 O Street, #230
Sacramento, CA 95816*Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT “A”

[TO SUBPOENA SERVED IN CASE NO. 4:23-cv-01432]

I. DEFINITIONS

For purposes of this Subpoena, the following definitions apply:

1. The terms “**YOU**,” “**YOUR**” or “**YOUTUBE**” means the party upon whom this request is being served, Google LLC, including any and all of its past or present parents, subsidiaries, divisions, affiliates, assignors, officers, directors, managers, executives, shareholders, members, agents, attorneys, loan out companies, accountants, and any and all persons or entities acting or purporting to act for or on its behalf or under its control or with common ownership at any time during the relevant period of these requests, including, without limitation, the YouTube platform.

2. The terms “**VÁSTAGO**” or “**PLAINTIFF**” means Plaintiff/Counter-Defendant VÁSTAGO PRODUCCIONES, LLC, including all its successors, assigns, agents, attorneys and all other persons acting or purporting to act on its behalf.

3. The terms “**RODRIGUEZ**” means Defendant/Counterclaimant MICHAEL RODRIGUEZ, including all his successors, assigns, agents, attorneys and all other persons acting or purporting to act on his behalf.

4. The term “**HEAVEN PUBLISHING**” means Defendant/Counterclaimant HEAVEN PUBLISHING LLC, including all its successors, assigns, agents, attorneys and all other persons acting or purporting to act on its behalf.

5. The term “**DEFENDANTS**” collectively means **RODRIGUEZ** and **HEAVEN PUBLISHING**.

6. The term “**ACTION**” means this action styled *Vástago Producciones, LLC v. Heaven Publishing LLC et al.*, with Case No. 4:23-cv-01432 pending in the United States District Court for the Southern District of Texas, Houston Division.

7. The term “**FIRST AMENDED COMPLAINT**” means the first amended complaint filed by VÁSTAGO against RODRIGUEZ and HEAVEN PUBLISHING on July 18, 2023 in the ACTION. [ECF 22].

8. The term “**ANSWER**” means the answer and affirmative defenses to the FIRST AMENDED COMPLAINT filed by RODRIGUEZ and HEAVEN PUBLISHING on August 8, 2023 in the ACTION. [ECF 27].

9. The term “**FIRST AMENDED COUNTERCLAIM**” means the first amended counterclaims filed by RODRIGUEZ and HEAVEN PUBLISHING on August 8, 2023 in the ACTION. [ECF 27 at 18-28].

10. The term “**MUSICAL WORKS**” means the 75 musical works set forth in the attached **Exhibit “1”**, which Exhibit “1” includes the ISWC for each MUSICAL WORK, and a YouTube Asset

ID Number and associated ISRC and UPC for certain known assets incorporating each MUSICAL WORK.

11. The term “**SOUND RECORDINGS**” means the certain sound recordings of the 75 MUSICAL WORKS set forth in the attached **Exhibit “1”**, which Exhibit “1” includes the YouTube Asset ID Number and associated ISRC and UPC for each SOUND RECORDING.

12. “**SOUNDEXCHANGE**” means SOUNDEXCHANGE, INC., including all its agents, partners, predecessors, successors, affiliates, attorneys, accountants and all present and former directors, officers, employees, agents, consultants, or other persons acting or purporting to act on its behalf.

13. “**BMI**” means Broadcast Music, Inc., including all its agents, partners, predecessors, successors, affiliates, attorneys, accountants and all present and former directors, officers, employees, agents, consultants, or other persons acting or purporting to act on its behalf.

14. “**ASCAP**” means the American Society of Composers, Authors and Publishers, including all of its agents, partners, predecessors, successors, affiliates, attorneys, accountants and all present and former directors, officers, employees, agents, consultants, or other persons acting or purporting to act on its behalf.

15. The term “**BMG**” means BMG Rights Management GmbH, including all its agents, partners, predecessors, successors, affiliates, attorneys, accountants and all present and former directors, officers, employees, agents, consultants, or other persons acting or purporting to act on its behalf.

16. The term “**HARRY FOX**” means The Harry Fox Agency, LLC, including all its agents, partners, predecessors, successors, affiliates, attorneys, accountants and all present and former directors, officers, employees, agents, consultants, or other persons acting or purporting to act on its behalf.

17. “**DOCUMENT**” has the broadest meaning contemplated by Rule 34(a)(1)(A), which includes: “any ... documents or electronically stored information – including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations – stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form.” The meaning of “**DOCUMENT**” shall also include all of the terms defined in Federal Rule of Evidence 1001 and any other tangible thing in which information may be embodied, translated, conveyed, or stored, including, but not limited to: bank records, ESI, social media information, messages and downloads of social media activity, email, electronic funds transfers, wire transfers, instant messages, text messages, digital pictures or movies or films, Power-Points®, Excel® spreadsheets, .pdfs, agreements, communications, including intracompany communications; facsimile transmissions; telephone bills and records; cables; records; books; summaries or records of personal conversations or interviews; forecasts; statistical statements; accountants' work papers including Working Papers; brochures; pamphlets; circulars; press releases; contacts; telephone messages, slips and logs; diary entries; electronic mail; calendars; reports; evaluations; assessments; analyses; test results; correspondence; memoranda; notes; videotapes; video cartridges; audio tapes; electronic or magnetic recordings of any kind; drawings; graphics; graphs; maps; diagrams; charts; photographs; computer diskettes, thumb drives, external hard drives, disks, other removable media and hard drives; tables; indices; recordings; tapes; microfilms; minutes or

records of meetings; reports of investigations; opinions or reports of consultants; and any other data compilation from which information can be obtained and translated through detection devices into reasonably usable form. If a draft **DOCUMENT** has been prepared in several copies that are not identical, or if the original identical copies are no longer identical due to subsequent notation, deletion, or revision, then each non-identical copy is a separate **DOCUMENT**. **PLAINTIFF** requests the any and all electronically stored information be produced in its native file format with its original metadata intact.

18. “**ALL DOCUMENTS**” means every document or group of documents as above-defined in your possession, custody, or control, or are known to you or that can be located or discovered by reasonably diligent efforts.

19. “**COMMUNICATION**” and “**COMMUNICATIONS**” shall interchangeably mean any documents comprised of oral or written statements or exchange of information of any type between any two or more persons, including but not limited to emails, text messages, instant messages, messages exchanged on social media platforms or mobile messaging apps including but not limited to Facebook® messenger, Instagram® direct messages, WhatsApp®, Line®, Skype®, Zoom® and all other messaging platforms and technology known now or developed in the future, documents, telephone or face-to-face conversations, meetings, conferences, and transfer of data from one location to another by electronic or similar means.

20. “**INTERNAL COMMUNICATION**” or “**INTERNAL COMMUNICATIONS**” shall interchangeably mean **COMMUNICATION** or **COMMUNICATIONS** between or among any of YOUR employees, temporary employees, officers, directors, owners, agents, representatives, and/or any individual who managed, directed, or supervised any aspect of YOUR business operations.

21. “**CORRESPONDENCE**” shall mean any and all documents, and communications comprised of emails, text messages, instant messages, messages exchanged on social media platforms or mobile messaging apps such as Facebook® messenger, Instagram® direct messages, WhatsApp®, Line®, Skype®, Zoom® and all other messaging platforms and technology known now or developed in the future, letters, facsimiles, transmitted memoranda, memorialized oral communications, or other communications or documents exchanged or transmitted with another person or entity.

22. “**PERSON**,” “**INDIVIDUAL**,” “**ENTITY**,” and “**ENTITIES**” are used interchangeably and shall be deemed to include the plural and vice versa. Each of these terms shall mean, but are not limited to: any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, business trust, or other business enterprise, governmental body or agency, legal or business entity, or group of natural persons, or other entity, whether *sui juris* or otherwise.

23. “Support,” “evidence,” “relate to,” “relating to,” “related to,” “referred to,” “concerning,” “pertaining to” and “regarding” shall mean anything which directly, or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any manner, is or was used in the preparation of, appended to, legally, logically or factually connected with, proves, disproves, or tends to prove or disprove.

24. The words “concerning,” “concerns,” or any other derivative thereof, as used herein includes referring to, responding to, relating to, pertaining to, connected with, comprising,

memorializing, commencing on, regarding, discussing, showing, describing, reflecting, analyzing and constituting.

25. The term “fact” includes all circumstances, events, and evidence pertaining to, relating to, or touching upon the item in question.

II. INSTRUCTIONS

A. For each and every Request herein, the RESPONDING PARTY shall produce documents in RESPONDING PARTY’S possession, custody, or control, which shall include, but not be limited to, documents, objects or articles described that are in RESPONDING PARTY’S possession or that RESPONDING PARTY has the right to secure the original or a copy from another person or entity. RESPONDING PARTY’S responses should consist of information known to RESPONDING PARTY through RESPONDING PARTY, its agents, attorneys, employees, accountants or representatives. All documents produced pursuant to this request are to be produced as they are kept in the usual course of business, and should be organized and labeled (without permanently marking the item produced) so as to correspond with the categories of each numbered request hereof. If copies or drafts exist of a document, the production of which has been requested herein, produce and submit for inspection and copying each and every copy and draft which differs in any way from the original document or from any copy or draft.

B. The RESPONDING PARTY is required to answer each request for production separately and as completely as possible. The fact that RESPONDING PARTY’S investigation is continuing, or discovery is incomplete is not an excuse for your failure to respond to each request as fully and completely as possible. RESPONDING PARTY’S responses should consist of information known to RESPONDING PARTY through itself and its agents, attorneys, employees or representatives. All documents produced pursuant to this Subpoena are to be produced as they are kept in the usual course of business and shall be organized and labeled (without permanently marking the item produced) so as to correspond with the categories of each numbered request hereof. If copies or drafts exist of a document, the production of which has been requested herein, produce and submit for inspection and copying each and every copy and draft which differs in any way from the original document or from any copy or draft. If RESPONDING PARTY cannot, after exercising due diligence to secure or produce the document(s) requested, RESPONDING PARTY is required to answer the request for production to fullest extent possible, specifying RESPONDING PARTY’S inability to produce the document(s), and by providing the identity of the person(s) who has possession, custody, or control of the requested document(s).

C. If RESPONDING PARTY at any time had possession, custody, or control of any document requested herein, and such document has been lost, destroyed, discarded, or is not presently in RESPONDING PARTY’S possession, these documents shall be identified as completely as possible, including:

- i. The names of the authors of the document;
- ii. The names of the persons to whom the documents or copies were sent;
- iii. The date of the document;
- iv. The date on which the document was received by each addressee, copyee or its recipients;
- v. A description of the nature and subject matter of the document that is as complete as possible;

- vi. The date on which the document was lost, discarded or destroyed; *and*
- vii. The manner in which the document was lost, discarded or destroyed.

D. With respect to any document that the RESPONDING PARTY withholds under claim of privilege, the RESPONDING PARTY shall number such documents, hold them separately, and retain them intact pending a ruling by the Court on the claimed privilege. In addition, the RESPONDING PARTY shall provide a statement setting forth as to each such document:

- i. The names of the senders of the document;
- ii. The names of the authors of the document;
- iii. The names of the persons to whom the document or copies were sent;
- iv. The job title of every person named in subparagraphs a, b and c above;
- v. The date of the document;
- vi. The date on which the document was received by each addressee, copyee or its recipient;
- vii. A brief description of the nature and subject matter of the document; *and*
- viii. The statute, rule or decision which is claimed to give rise to the privilege.

E. If RESPONDING PARTY cannot, after exercising due diligence, secure or produce the document(s) requested, RESPONDING PARTY must identify which Request(s) that RESPONDING PARTY does not have any responsive documents for, and answer the request to the fullest extent possible, specifying RESPONDING PARTY'S inability to produce the document(s), providing the identity of the person who has possession, custody, or control of the requested document(s).

F. **ESI:** these requests seek, among other things, the discovery of ESI and email. An appropriate search of ESI and email ordinarily requires an electronic search utilizing specific search terms and other parameters and should cover appropriate custodians. RESPONDING PARTY must identify appropriate document custodians whose ESI, email accounts, and social media accounts, as well as ESI, email accounts or social media accounts to which RESPONDING PARTY has access, and those used by others at RESPONDING PARTY'S direction, as well as all computers RESPONDING PARTY used or had access to, or others used at RESPONDING PARTY'S direction, and other servers and back-up systems, and all of the foregoing must be searched. In addition, all computer systems used by RESPONDING PARTY at any time during the relevant time frame including, but not limited to, any work or personal computers, mobile devices, tablets, portable or external hard drives or any cloud-based storage systems must be searched. The search is applied across all servers, computer systems, and back-up systems. *A visual review of a custodian's social media accounts, email accounts, hard drives or cloud storage is not sufficient.*

G. **Metadata:** With respect to the production of any and all electronically stored information, Plaintiff requests that any and all electronically stored information be produced in its native file format with its original metadata intact.

H. **Possession, Custody, or Control:** Each request set out below extends to any DOCUMENTS in the possession, custody, or control of RESPONDING PARTY. A document is deemed to be in RESPONDING PARTY'S possession, custody or control, if it is in RESPONDING PARTY'S physical custody, or if it is in the physical custody of any other person and the RESPONDING PARTY (a) owns such document in whole or part; (b) has a right by contract, statute or otherwise to use, inspect, examine or copy such document on any terms; (c) has, as a practical matter, been able to use, inspect, examine or copy such document when the RESPONDING PARTY has

sought to do so. Such DOCUMENTS shall include, without limitation, DOCUMENTS that are in the custody of the RESPONDING PARTY'S attorney(s) or other agent(s).

I. **Time Period:** A request for documents within a particular time period shall be deemed to include all documents that were dated, prepared, sent or received during that time period.

J. All words in this request shall have their plain and ordinary meanings unless specifically defined herein.

K. The singular and plural forms shall be construed interchangeably so as to bring within the scope of this document request any information which might otherwise be construed as outside their scope.

L. "And" and "or" shall be construed interchangeably so as to bring within the scope of this document request any information which might otherwise be construed as outside their scope.

M. "Any" and "all" shall be construed to bring within the scope of this request any information which might be construed to relate to the subject matter of the request.

N. The use of the singular form of any word includes the plural and vice versa.

DOCUMENTS AND THINGS REQUESTED

1. **ALL DOCUMENTS** reflecting any revenues, income, royalties and/or other monies collected, received by, or paid to **YOUTUBE** in connection with the exploitation, licensing, sale, or monetization of the **MUSICAL WORKS**.

2. **ALL DOCUMENTS** reflecting any royalties and/or other monies currently being held by **YOUTUBE** in connection with the **MUSICAL WORKS**.

3. **ALL DOCUMENTS** reflecting any revenues, income, royalties and/or other monies collected, received by, or paid to **YOUTUBE** in connection with the exploitation, licensing, sale, or monetization of the **SOUND RECORDINGS**.

4. **ALL DOCUMENTS** reflecting any royalties and/or other monies currently being held by **YOUTUBE** in connection with the **SOUND RECORDINGS**.

5. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **RODRIGUEZ**, or to any third party on behalf of **RODRIGUEZ**, in connection with the **MUSICAL**

WORKS.

6. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **RODRIGUEZ**, or to any third party on behalf of **RODRIGUEZ**, in connection with the **SOUND RECORDINGS**.

7. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **HEAVEN PUBLISHING**, or to any third party on behalf of **HEAVEN PUBLISHING**, in connection with the **MUSICAL WORKS**.

8. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **HEAVEN PUBLISHING**, or to any third party on behalf of **HEAVEN PUBLISHING**, in connection with the **SOUND RECORDINGS**.

9. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **VÁSTAGO**, or to any third party on behalf of **VÁSTAGO**, in connection with the **MUSICAL WORKS**.

10. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **VÁSTAGO**, or to any third party on behalf of **VÁSTAGO**, in connection with the **SOUND RECORDINGS**.

11. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to **BMG, HARRY FOX, BMI, and/or ASCAP** in connection with the **MUSICAL WORKS** or **SOUND RECORDINGS**.

12. **ALL DOCUMENTS** reflecting any revenues, income, mechanical royalties, performance royalties, or other royalties or monies **YOUTUBE** has paid, credited, or sent to any **PERSON** in connection with the **MUSICAL WORKS** or **SOUND RECORDINGS**.

EXHIBIT “1”

Asset ID	Asset Type	Display Title	ISRCs	UPC	ISWC	(former ISWC)
A610976476414062	Sound Recording	A sus pies - Jesus Adrian Romero	USATJ0500707	820617100722	T0723401635	
A563446095770979	Sound Recording	A Sus Pies - Jesús Adrián Romero	USATJ0500912 USATJ0500707	3616842025179	T0723401635	
A532174375234929	Sound Recording	A Sus Pies - Jesús Adrián Romero	USATJ0500757		T0723401635	
A569878243105309	Sound Recording	A Sus Pies - Jose "Papó" Rivera, La Salsa De La Fe	QZN882111066 ESA011716026	7316475169474	T0723401635	
A653320086055165	Sound Recording	A Sus Pies (Pista) - Jesus Adrian Romero	USATJ0500757		T0723401635	
A439109318479259	Sound Recording	A Sus Pies (Pista) - Los Cantantes Catolicos	US6R21452358	888831611561	T0723401635	
A920160223105363	Sound Recording	A Sus Pies (Unplugged) - Jesús Adrián Romero	USATJ0501810	820617101828	T0723401635	
A616324319318246	Sound Recording	Al Estar Ante Mi - Worship Band	ARA820900598	885686412633	T0733201336	
A722701504910751	Sound Recording	Al Estar Ante Ti (Con Alejandro Del Bosque) - Jesús Adrián Romero	USATJ0501514	820617101521	T0733201336	
A877592752201382	Sound Recording	Al Estar Ante Ti (Pista) - Alejandro Del Bosque	USATJ0501564	820617101569	T0733201336	
A350588120629445	Sound Recording	Alegrense Los Cielos - Orlando Hernandez	USATJ0100405	820617100425	T0733203592	
A271252527348931	Sound Recording	Alzad Oh Puertas - Jesús Adrián Romero	USATJ0501501	820617101521	T0721006741	
A996876577221758	Sound Recording	Antes De Ti - Marcela Gandara	USATJ0602707		T0733203229	
A447616935826918	Sound Recording	Antes de Ti - Marcela Gandara	USATJ0602707 USATJ0602757	820617102726	T0733203229	
A705830787240056	Sound Recording	Antes de Ti (En Vivo) - Marcela Gandara	QM4TW1711510		T0733203229	
A419133285170504	Sound Recording	Antes De Ti (Pista) - Jorge Arias, Claudia Mercado	QMBZ91539374	190374137669	T0733203229	
A495347821983137	Sound Recording	Antes de Ti (Sin Voces De Fondo) - Marcela Gandara	USATJ0602764	820617102740	T0733203229	
A711585211719023	Sound Recording	Antes De Ti [LIVE] - Marcela Gandara	USATJ1205002	820617105024	T0733203229	
A641794148882114	Sound Recording	Arde Mi Corazon - Gamaliel Ruiz	USATJ0501206	820617101224	T0721006923	
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A257021293060228	Sound Recording	Aunque Mis Ojos (Instrumental) - Alabanza Musical	GBSMU3863531	5051813160295	--	
A473757977263871	Sound Recording	Bajo Sus Pies - Jesus Adrian Romero	QMDA61854890		T9124335291	
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A247394833685044	Sound Recording	Como Neblina - Gamaliel Ruiz	USATJ0703010	820617103020	T0733221481	
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A317511631749199	Sound Recording	Crece Mas Mi Amor Por Ti - Jesús Adrián Romero	USATJ11004212	820617104225	T9035952922	
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A228248806506067	Sound Recording	Hasta Acabar Mi Viaje (Ft. Rocio Cereceres) (Live) - Jesús Adrián Romero	USATJ1205307	820617140537	T9099426672	
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A10116329720790	Sound Recording	Mas Que un Anhelito (Karaoke Version) - The Hit Crew	US85C1314415		T0733291241	
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A222440302260015	Sound Recording	Tú Estás Aquí - Alabanza Musical	GBSMU3833559	5057302605896	T0733342443
A417074909312918	Sound Recording	Tú estás aquí - Andy Humphries	GBLLT1612795	5055462981379	T0733342443
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A611144480741858	Sound Recording	Tu Estas Aquí - Marcela Gandara	QM6MZ1775630		T0733342443
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A946230137797508	Sound Recording	Tú Estás Aquí - Mariachi Así Es México	USHM81879163	018736550607	T0733342443

A602206735054588	Sound Recording	Tú Estás Aquí - Maurilio Suárez y el grupo Méssia	TCABR1341403		T0733342443	
A672160052489825	Sound Recording	Tú Estás Aquí - Maurilio Suárez y el grupo Méssia	TCAAR1038266	7502235390121	T0733342443	
A438650861242098	Sound Recording	Tu Estás Aquí - Michely Manuely	BR1YX1300007	7892860221199	T0733342443	
A275415569376998	Sound Recording	Tu estas aquí - Misión Juvenil	GBSMU6096354	5059137692263	T0733342443	
A419381087302098	Sound Recording	Tu Estás Aquí - Música Relajante	QZ5AB2148806	759159200150	T0733342443	
A606510694892334	Sound Recording	Tú Estás Aquí - Quely Ugalde	TCADT1897480		T0733342443	
A326247820987691	Sound Recording	Tú Estás Aquí - Shak Ruiz	QZHZ51927667	636665370822	T0733342443	
A725877551636065	Sound Recording	Tu Estas Aqui - SimriMusic	QZ5AB2062856	759108587400	T0733342443	
A487654772603662	Sound Recording	Tu estas aqui - Sofia Lopez	QZNNWR2089498		T0733342443	
A605313763398323	Sound Recording	Tu Estas aquí - Sprit Of Life	FR1051872176	3615930691418	T0733342443	
A356307656476430	Sound Recording	Tu Estas Aqui - Uriel Vega	TCABX1449169	859712660763	T0733342443	
A162045910524698	Sound Recording	Tu Estas Aquí - Worship Band	ARA820900597	885686412633	T0733342443	
A234680612649105	Sound Recording	Tú Estás Aquí - Worship Band	ARA821600920	191773681470	T0733342443	
A256162123191632	Sound Recording	Tú Estás Aquí (Acústico) - Lumilunia	ES03S1501609	889845554097	T0733342443	
A166806396939886	Sound Recording	Tú Estás Aquí (Alabanzas a Cristo) - Alabanzas Cristianas	QZ22B1925570		T0733342443	
A536552489689320	Sound Recording	Tú Estás Aquí (En Vivo) [feat. Marcela Gandara] - Jesús Adrián Romero	USATJ0501512 USATJ1104404 USATJ1104454	820617101521	T0733342443	
A369750900062350	Sound Recording	Tu Estas Aqui (Feat. Marcela Gandara) - Jesus Adrian Romero	USATJ0501512 QZEFU1902451	820617101521	T0733342443	
A401632581136079	Sound Recording	Tú Estás Aquí (Feat. Marcela Gandara) - Jesús Adrián Romero	USATJ1104404		T0733342443	
A277936346912799	Sound Recording	Tú Estás Aquí (Feat. Marcela Gándara) - Jesus Adrian Romero	USATJ0501512 ES71G1908308	820617101521	T0733342443	
A450135570754511	Sound Recording	Tu Estas Aqui (Feat. Ungi2) - La Legion De Eva	USITQ1717683 USITQ1005930 QM6DC1505257	600484129428	T0733342443	
A170704193707246	Sound Recording	Tú Estás Aquí (Ft. Jesús Adrián Romero) [LIVE] - Marcela Gandara	USATJ1205006	820617105024	T0733342443	
A155175260334926	Sound Recording	Tu Estas Aqui (Ft. Marcela Gandara) - Jesús Adrián Romero	USATJ0501512 USATJ1205006	820617101521	T0733342443	
A758336206592360	Sound Recording	Tú Estás Aquí (Ft. Marcela Gándara) - Jesús Adrián Romero	USATJ0501512	820617101521	T0733342443	
A575189802526197	Sound Recording	Tú Estás Aquí (Pista) - Jesús Adrián Romero	USATJ0501562	820617101569	T0733342443	
A645781816791067	Sound Recording	Tu Estas Aqui (Pista) - Jorge Arias	QMFME1561428	190374699044	T0733342443	
A919665431292687	Sound Recording	Tu Estas Aqui (Pista) - Los Cantantes Catolicos	QMBZ91343034	888003969063	T0733342443	
A722366824768378	Sound Recording	Tu Estas Aqui (Playback/Karaoke) - Michely Manuely	US7VG1466273	645789130700	T0733342443	
A300334074795271	Sound Recording	Tu Has Sido Fiel - Angie de la Mota	USHM22197502	198000554439	T0733342432	
A105211235066321	Sound Recording	Tú Has Sido Fiel - Loyda López	USDHM1817279		T0733342432	
A238778051949628	Sound Recording	Tú Has Sido Fiel (Duetto Con Pecos Romero) (Unplugged) - Jesús Adrián Romero	USATJ0501815	820617101828	T0733342432	
A764986623080291	Sound Recording	Tú Has Sido Fiel (Ft. Pecos Romero) - Jesús Adrián Romero	USATJ0501513	820617101521	T0733342432	
A771616046002766	Sound Recording	Ven - Marcela Gandara	USATJ0903805	820617103822	T9270612312	T9068243174
A456713464415691	Sound Recording	Ven Te Necesito - Areli	uscgj1428957		T0733351922	
A507173672058280	Sound Recording	Ven Te Necesito - Daniel Sebastian;	US1174056879		T0733351922	
A874501853774811	Sound Recording	Ven Te Necesito - Jesús Adrián Romero	QM24S1831815	193436013369	T0733351922	
A939693681077969	Sound Recording	Ven Te Necesito - La Red Ministerios	COA6W1900328 QM4TW1549905		T0733351922	
A877142362360471	Sound Recording	Ven te Necesito - Los Seguidores de Jesús	GBSMU6175012	5059137585053	T0733351922	
A748887263983224	Sound Recording	Ven Te Necesito - Oscar Cruz	ARA821601190	191018731878	T0733351922	
A612874381836032	Sound Recording	Ven Te Necesito - Sofia Gala	ES03S1602926	192562794753	T0733351922	
A969220347068312	Sound Recording	Ven Te Necesito - Soluciones Live	ES71G1846403 USATJ0501812		T0733351922	
A369798229095154	Sound Recording	Ven Te Necesito - Tono de Fe	QZES61882725		T0733351922	
A254873018461590	Sound Recording	Ven Te Necesito (Unplugged) - Jesús Adrián Romero	USATJ0501812	820617101828	T0733351922	
A859392264521845	Sound Recording	VEN TE NECESITO-27393 - EVITA ULLOA Y FRANCISCO TRAVIEZO	CIXTH5728484		T0733351922	
A714153922934560	Sound Recording	Ven, Te Necesito (Duetto Con Jesús Adrián Romero) - Lilly Goodman	USATJ0501305 USATJ0401410	820617101323	T0733351922	
A317232445657751	Sound Recording	Ven, Te Necesito (Instrumental) - Lewis Morris	QMFMF1548761	190374824545	T0733351922	
A343126037665540	Sound Recording	Ven, Te Necesito (Instrumentales) - Super Tamarindo All Stars	QZ7R41851017 USATJ0501355	792278039607	T0733351922	
A810789696620237	Sound Recording	Viviré - Abel Zavala	USATJ0903603	820617103624	T9270612378	
A641589914362876	Sound Recording	Ya Estoy Aquí - Luis Campos	USATJ1305608	820617105628	T9103506601	
A633805502804977	Sound Recording	Yo No Esperaba - Vastago Epicentro	USATJ1406506	820617106526	T9158269148	
A454703816899524	Sound Recording	Yo No Esperaba - Vástago Epicentro	USATJ1406506	820617106526	T9158269148	